

Mutual Data Services, Inc.

319 N. Clinton St.

St. Johns, MI 48879

Marlene H. Dortch

Secretary

Federal Communications Commission

445 Twelfth Street, SW

Washington, D.C. 20554

Re: CC Docket No.02-33

Notice of Proposed

Rulemaking (FCC 02-42)

Dear Ms. Dortch:

On behalf of Mutual Data Services, Inc., I am writing to express my support for the comments filed on the above-referenced proceeding by The Wireless Communications Association International, Inc. ("WCA"), and to urge the Commission not to impose Universal Service Fund obligations on smaller license-exempt providers of wireless broadband services.

We are a small local business with a staff of three. Since 2000, we have been using the 2.4 GHz and/or 5 GHz license-exempt bands to provide high-speed Internet access to three rural communities in Michigan, where there is little or no cable modem or DSL service. Even where cable modem or DSL is available, we are the only competitive alternative. Despite our small size and lack of funding from the government or the capital markets, we have been able to provide our customers with the type of broadband service usually available only in the larger cities, and we are doing so at an affordable price. We also are providing broadband service to libraries, schools, and local government units, giving those entities the ability to use broadband to deliver better and more cost-efficient services to their constituents.

Like any other small business, we face many daunting economic challenges but have only limited resources available to us. We therefore

are very concerned about the possibility that the Commission will subject us to USF reporting and contribution obligations.

While we generally support the broad objectives of universal service, we do not believe it is equitable to sacrifice the future of wireless broadband (which operates without subsidy) to support "copper wire" services that wireless is better equipped to provide in underserved areas. Also, we are not an ILEC or a cable MSO, and we simply cannot afford the personnel or administrative resources necessary for USF compliance. Any diversion of what little staff we have will have a direct and immediate adverse effect on our ability to serve our customers. Our business, in other words, would be put at unnecessary risk, and our customers ultimately would pay the price.

We therefore urge the Commission to take these considerations into account and, at a minimum, not impose USF reporting and contribution obligations on smaller license-exempt providers of broadband service. Thank you.

Very truly yours,

Barry Buchholz Jr.  
President

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